

**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2021-__-E

United States Department of Defense and)	<u>PETITION FOR AN ORDER</u>
all other Federal Executive Agencies,)	<u>GRANTING A WAIVER OF THE</u>
)	<u>QUEUE REQUIREMENT OF THE</u>
Petitioner)	<u>SOUTH CAROLINA GENERATOR</u>
)	<u>INTERCONNECTION</u>
v.)	<u>PROCEDURES</u>
)	
Dominion Energy South Carolina,)	
)	
Respondent.)	

Pursuant to South Carolina Code Ann. § 58-27-460(C), the Public Service Commission’s Regulation 103-825, and Public Service Commission Order Numbers 2016-191 and 2020-535, the United States Department of Defense and all other Federal Executive Agencies (“DoD/FEA”), by and through its legal counsel, hereby petitions the South Carolina Public Service Commission (“Commission”) for an Order granting a waiver of the requirement of the South Carolina Generator Interconnection Procedures (“SCGIP”) that the project be studied in serial queue order (the “Queue Requirement”) and directing Dominion Energy South Carolina to immediately conduct its study and review of DoD/FEA’s Combined Heat and Power Project (“Project”) located at Fort Jackson under the terms of the SCGIP.

1. DoD/FEA consists of various federal agencies, including the United States Department of Defense. DoD is a federal agency, whose mission it is to deter war and

ensure national security. The Department of the Army is a military department within DoD, who performs DoD's land combat operations.

2. DoD/FEA own and operate numerous facilities and buildings within Dominion Energy South Carolina Inc.'s ("DESC") territory, including Fort Jackson, a U.S. Army installation, located in Columbia, South Carolina. Fort Jackson is the U.S. Army's main production center for Basic Combat Training, with it providing basic training to 45,000 soldiers. Furthermore, Fort Jackson provides advanced training to 24,000 soldiers per year. Fort Jackson's economic impact (both direct and via an economic multiplier effect) is \$2.3 billion on the State of South Carolina. This includes 20,021 jobs and approximately \$1.1 billion in labor income. Approximately 225,000 people visit Fort Jackson each year, which mainly consists of those attending the graduation ceremonies. These visitors utilize the local hotels, restaurants, and other commercial establishments. Statewide, the overall economic impact of the military community is even greater at \$24.1 billion, which includes 181,847 jobs and \$9.9 billion in labor income.

3. Pursuant to 10 U.S.C. § 2911, the Secretary of Defense shall ensure the readiness of the armed forces for their military missions by pursuing energy security and energy resilience. Under 10 U.S.C. § 2914, the Secretary of Defense is authorized to carry out military construction projects for energy resilience, energy security or energy conservation. Pursuant to 10 USC § 2914, the Energy Resilience and Conservation Investment Program (ERCIP) is a DoD Military Construction program for projects that increase energy resilience, reduce energy and water consumption, and construct renewable energy systems. The Office of the Secretary of Defense manages ERCIP and allocates funding to Military Departments and Agencies on a competitive basis.

4. Fort Jackson applied for ERCIP funds, competed against other projects across all DoD services worldwide, and ultimately was selected as a recipient of ERCIP funds.

5. Specifically, the Project at Fort Jackson is for two natural gas-driven combined heat and power (“CHP”) units that will service two buildings: Building 4420 and Building 11000. These buildings are known as “Starships,” which are used to conduct Fort Jackson’s training mission. These Starships contain the training areas and classrooms, headquarters, administration, and house the trainees. The combined power output from the CHP units shall be approximately 1.0 MW, and any excess power generated will be back-fed into Fort Jackson’s utility distribution system, so it can be utilized elsewhere on the installation.

6. Because the Project will ultimately connect to Dominion Energy South Carolina’s electrical grid, Fort Jackson applied for an interconnection agreement on or about April 22, 2021 with DESC. Upon receiving the completed application, DESC informed Fort Jackson that its state queue position for DESC to study the Project is 537. The Project is not eligible for the SCGIP’s Fast Track Process because the generators are not inverter-based resources and the point of interconnection is to the DESC transmission system. Because DESC is unable to predict how long the studies would take for those projects ahead of Fort Jackson in the queue, DESC could not provide an estimate as to when DESC would reach Fort Jackson’s number in the queue in order to study Fort Jackson’s Project.

7. As stated above, Fort Jackson was awarded a grant for this Project under ERCIP, and it meets DoD’s requirements of energy resilience, energy security and energy conservation. Indefinite delay due to the SCGIP Queue Requirement will hinder DoD’s statutory requirement to ensure the readiness of the armed forces for their military missions

through energy security and energy resilience. Additionally, excessive delay could increase the project's overhead costs, which ultimately could force Fort Jackson to terminate the project if costs become too high.

8. This Commission has the authority to waive any requirement under the SCGIP if it is in the public interest.

9. It is in the public interest for the Commission to grant a waiver to the Queue Requirement under SCGIP and order DESC to immediately study the project. The Project will provide energy resiliency, security and conservation for Fort Jackson, so that it will be able to continue to train the nation's soldiers, without disruption from any potential grid outage of DESC. Ensuring the readiness of the armed forces for their military missions is in the public interest.

10. DoD/FEA consulted with DESC prior to filing this petition. Based on Commission Order Number 2020-535 and the unique facts and circumstances of this case, DESC indicated it would not object to DoD/FEA's request for a waiver of the Queue Requirement.

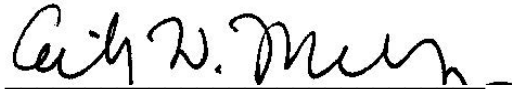
11. The attorney authorized to represent DoD/FEA in this proceeding and take service of all documents is:

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WHEREFORE, the United States Department of Defense and all other Federal Executive Agencies respectfully requests an Order granting a waiver of the Queue

Requirement of the SCGIP and directing Dominion Energy South Carolina to immediately conduct its study and review of DoD/FEA's Combined Heat and Power Project under the terms of the SCGIP.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Emily W. Medlyn", with a horizontal line underneath.

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